

201-14399

April 10, 2003

Christine Todd Whitman, Administrator
Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Comments on the HPV test plan and robust summary for m-diisopropenylbenzene, prepared by Cytec Industries, Inc.



PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

HEADQUARTERS
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Dear Administrator Whitman:

The following comments are on the test plan for m-diisopropenylbenzene, prepared by Cytec Industries, Inc. These comments are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the U.S., the Doris Day Animal League, and Earth Island Institute. These health, animal and environmental protection organizations have a combined membership of more than ten million Americans.

Cytec has presented a great deal of data from previous studies in this test plan and, on the basis of these data, has appropriately concluded that no additional testing is necessary under the High Production Volume Chemical Challenge.

We appreciate Cytec's acknowledgement that more animal data are not needed for m-diisopropenylbenzene, because it "is used exclusively as an industrial intermediate, chemically converted to other products," with strictly limited potential for human exposure (test plan, p. 11). This decision indicates that careful consideration has been given to the real-world status of this compound and that 'thoughtful toxicology' has been used in accordance with principles set forth in the October 1999 agreement among the EPA, industry, and animal protection organizations. These include the requirement that "in analysing the adequacy of existing data, participants shall conduct a thoughtful, qualitative analysis rather than use a rote checklist approach. Participants may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested." And that "as with all chemicals, before generating new information, participants should further consider whether any additional information obtained would be useful or relevant."

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at JessicaS@PETA.org.

Sincerely,

Jessica Sandler
Federal Agency Liaison
PETA

Richard Thornhill, PhD
Research Associate
PETA Research and Education Foundation

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